



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

**FILED**

02-28-08

04:59 PM

Application of Pacific Gas and Electric Company To  
Revise Its Electric Marginal Costs, Revenue Allocation,  
and Rate Design.

(U 39 M)

Application 06-03-005  
(Filed March 2, 2006)

**COMMENTS OF  
THE CALIFORNIA LARGE ENERGY CONSUMERS ASSOCIATION  
ON DRAFT PROPOSALS CONTAINED IN THE  
ASSIGNED COMMISSIONER'S RULING  
ON DRAFT TIMETABLE AND RATE GUIDANCE AND UPDATING SCHEDULE**

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February 28, 2008

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**I. INTRODUCTION**

The California Large Energy Consumers Association ("CLECA") respectfully files its comments on the January 23, 2008, Assigned Commissioner's Ruling ("ACR") of Commissioner Rachelle B. Chong requesting comments on draft proposals for implementation of dynamic pricing for Pacific Gas & Electric Company ("PG&E") and updating the schedule for this proceeding. The ACR indicated that the draft proposals it contains were prepared based on previous comments filed by parties to this proceeding and the workshops held on November 5 and 6, 2007. CLECA was an active participant in prior phases of this proceeding, as well as the above-mentioned workshops, and submitted extensive comments in this phase of the proceeding. CLECA intends to continue to be active in this docket.

The ACR states that "the primary objective of this phase [of this proceeding] is to create a year-by-year strategic work plan that will direct PG&E to develop and integrate dynamic pricing rates into PG&E's rate design for all customers by 2011. The strategic work plan should answer three questions:

1. What types of dynamic pricing tariffs should PG&E offer to its customers?
2. When should PG&E offer each type of dynamic pricing tariffs (sic) to each

customer class?

3. How should the dynamic pricing tariffs be designed and integrated into PG&E's overall rate design?"<sup>1</sup>

The ACR presents draft answers to these questions, including a timetable, in

Attachment A. CLECA's comments on specific issues raised in the ACR follow.

## **II. TIMING OF REAL TIME PRICING ("RTP") TARIFFS**

CLECA is generally supportive of the option of RTP tariffs, based on prices in the day-ahead California Independent System Operator ("CAISO") market. However, these day-ahead prices will not be available until the implementation of the CAISO's Market Redesign and Technology Update ("MRTU"), which has been delayed several times. Attempts to mimic day-ahead RTP based on proxies have not been very successful. For example, current real-time balancing market prices reflect less than five percent of the power being used, and have demonstrated relatively low prices with spikes related to matters other than overall system demand. Prices from the 1998-2000 operations of the California Power Exchange ("PX") reflect a period when virtually all power that was used was sold into and purchased out of the PX market. This market had virtually no hedging and was not representative of what the power market will look like going forward. Furthermore, prices in shoulder months, such as October and November, may be artificially high. In short, there is no reasonable basis for estimating what day-ahead RTP will look like in the future. CLECA concurs with PG&E that at least 12-18 months of data in the new market will be needed before participants would have confidence that the market has sufficiently matured to become truly functional. This means that RTP for tariff purposes is unlikely to be available until probably 2011 at the earliest.

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<sup>1</sup> ACR at 2.

### **III. LARGE COMMERCIAL AND INDUSTRIAL (“C&I”) CUSTOMER RATES**

While the workshops and related comments showed that most large C&I customers do not support Critical Peak Pricing (“CPP”) as a default rate, CLECA believes that it is a viable rate option for many such customers and should continue to be made available to them on an ongoing basis. Indeed, there are large C&I customers on this rate option right now. For example, there are those who have combined this rate option with Auto-DR (technologically enabled demand response linked to CPP prices communicated on a day-ahead basis), and have demonstrated significant usage reductions during CPP event periods that benefit themselves and all other customers. CLECA believes that CPP rates should continue to be an option for large C&I customers on a voluntary basis.

One attribute of CPP rates that should be reviewed is the duration of the CPP period. CLECA believes that the preference expressed by San Diego Gas and Electric Company (“SDG&E”) for a 7-hour CPP period is too long and would constitute a potentially significant impediment to choice of this rate option by many customers. For commercial customers, a CPP period of 11 a.m. to 6 p.m. would cover the vast majority of their operating day and extending CPP rates for this duration could have significant adverse impacts on their operations. A 4-hour CPP period, in contrast, would allow for pre-cooling and other practices by end users to reduce their usage on-peak while maintaining operations. The Commission should therefore seriously consider setting the CPP period at 4 hours, to allow for this mitigation of rate impacts while allowing desired usage reductions.

CLECA believes that large C&I customers should have a choice of a CPP or RTP rate option in the future. Indeed, if the Commission supports voluntary dynamic pricing, then current TOU-type rates should continue to be an option in the future as well. These CPP and RTP rates should be designed to be revenue neutral rate relative to the TOU rate, that is, collect the same

amount of revenue from the class or subclass as the otherwise applicable TOU rate. However, over time, as customers migrate to any of these three rate options, the load characteristics of the customers that are actually on each of those options should determine the cost to serve those customers. Therefore, in the future, the various rate schedules may not all be mutually revenue neutral, but rather reflect the actual cost to serve these different groups of customers.

CLECA is confused by the reference in the text of the ACR to a year of CPP or RTP default rates, with a subsequent opt-out option to TOU rates “following a one-year period on a dynamic pricing rate during which bill protection would be in place.”<sup>2</sup> This appears to be inconsistent with Attachment A to the ACR which provides for large C&I customers to have a choice of CPP or RTP with the ability to opt-out to TOU. It is unclear whether the latter refers to an opt-out only after a year with bill protection, or immediately, as provided for under the SDG&E rate settlement in A.07-01-047.<sup>3</sup>

CLECA has not generally been supportive of *default* dynamic pricing rates like CPP or RTP, with only an option to opt-out to a TOU rate, after a year’s experience with the new rates and bill protection. In the recent SDG&E General Rate Case (“GRC”) Phase 2 proceeding, parties pointed out that bill protection coming only at the end of the year can create cash flow problems for customers who see significant bill increases under default rates during summer months. Should the Commission choose to move in this direction, some strategy for avoiding these cash flow problems should be incorporated into any plan to adopt default rates with bill protection.

Furthermore, any revenue shortfalls that occur as a result of the use of default rates with bill protection should be kept within the relevant rate classes and not spread to all other

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<sup>2</sup> ACR at 6.

<sup>3</sup> SDG&E Phase 2 GRC (filed Jan. 31, 2007).

customers. Over time any adjustments should be minimized as the load shape of the customers on a given rate option stabilizes. CLECA is not convinced that the impact of adjustments to make up revenue shortfalls will result in the kind of substantial migration of customers among rate options that PG&E fears. However, this matter should be tracked over time to see if such events actually occur to any significant degree.

#### **IV. DO WHOLESALE MARKET PRICES FOR ENERGY REFLECT THE TOTAL MARGINAL COST OF GENERATION**

Wholesale market prices for energy do not reflect the total marginal cost of generation. Most generators receive compensation from Resource Adequacy (“RA”) payments for some of their capacity costs. Furthermore, considerable power is sold under tolling contracts with combined energy and capacity payments. Unless and until California moves to an energy-only market, most generators will continue to recover some of their costs in non-energy payments. Furthermore, if California were to decide to move to a centralized capacity market (“CCM”), a position CLECA does not support, generators could receive very large amounts of revenue to recover their costs on a capacity basis, exceeding the capacity costs for existing generators. In short, while it is true that there are substantial differences of opinion and methodology for estimating the level of capacity costs not reflected in energy prices, it is abundantly clear that they are far from zero for the vast majority of generators.

The ACR states that “[o]nce the amount of capacity costs not reflected in energy prices is estimated, the utilities will have several rate design options to reflect capacity costs including the following:

- [A] flat adder or a percentage adder that allocates costs across all time periods;
- [A]n on-peak energy cost adder or critical peak price that allocates costs to peak or critical peak periods;
- [F]ixed monthly demand charges; or

- [D]emand charges based on maximum monthly demand during peak periods or during all time periods.”<sup>4</sup>

CLECA believes that there will never be general agreement on how best to estimate “the level of capacity costs not reflected in energy prices” or even the marginal cost of generation capacity, per se. This issue has been litigated and should continue to be litigated in Phase 2 of utility GRCs, which traditionally address marginal costs, revenue allocation, and rate design. CLECA also believes that the recovery of generation capacity costs from customers through rates should follow the probability of the need for new generation capacity at the margin, both diurnally and seasonally, which is currently best reflected by loss of load probability, expected unserved energy, or some similar measure. For this reason, a flat adder is not cost-based and recovery of such costs through either demand charges, or energy charges, should be cost-based and vary by season and time of use. If RTP energy rates are to reflect the actual day-ahead energy prices in the CAISO market, the use of adders to the energy market prices to recover capacity costs is most likely to confuse the market price signals that the rate design is intended to send. This is the reason why most, if not all, RTP rate designs include demand charges or are two-part rates.

## **V. HEDGING PREMIUM**

CLECA agrees that it is premature to address the issue of hedging premiums at this time.

## **VI. DRAFT TIMETABLE – RESIDENTIAL AND AGRICULTURAL**

CLECA does not believe that there is any justification for permitting the residential class to opt-out to a flat rate after AB 1X rate protections end. Nor does CLECA believe there is any justification for permitting small and medium agricultural customers to opt-out to flat rates. All residential and agricultural customers should have a TOU default rate once they have interval

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<sup>4</sup> ACR at 8.

meters, just like other groups of customers. The billions of dollars California has invested in interval meters for residential and small and medium agricultural customers will be of little benefit if such customers are permitted to simply elect flat rate service. No justification has been presented as to why residential or small and medium agricultural customers should be permitted to have rates which provide no information as to how costs vary depending on the season and time of use. Furthermore, residential customers represent a large portion of the on-peak air conditioning loads that are driving the need to add capacity to the utility systems. It is important to communicate costs through proper price signals to residential customers as well as C&I and agricultural customers.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I, Judy Pau, certify:

I am employed in the City and County of San Francisco, California, am over eighteen years of age and am not a party to the within entitled cause. My business address is 505 Montgomery Street, Suite 800, San Francisco, California 94111-3834.

On February 28, 2008, I caused the following to be served:

**COMMENTS OF  
THE CALIFORNIA LARGE ENERGY CONSUMERS ASSOCIATION  
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ASSIGNED COMMISSIONER'S RULING  
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via electronic mail to all parties on the service list A.06-03-005 who have provided the Commission with an electronic mail address and by First class mail on the parties listed as "Parties" and "State Service" on the attached service list who have not provided an electronic mail address.

/s/ Judy Pau

Judy Pau

### **VIA US MAIL AND EMAIL**

Commissioner Rachelle B. Chong  
Administrative Law Judge David K. Fukutome  
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## SERVICE LIST

Proceeding: A0603005 - PG&E - TO REVISE ITS  
Filer: PACIFIC GAS AND ELECTRIC COMPANY (U39E)  
List Name: LIST  
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